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February 5, 2020

Honorable J.P. Stadtmueller
United States Courthouse
Room 471
517 East Wisconsin Avenue
Milwaukee, WI 53202

***Re: United States v. Matthew Neumann, et al.
Case No. 19-CR233***

On behalf of Donald Neumann, counsel joins the request of counsel for Matthew Neumann in respectfully requesting a scheduling conference with the Court to set a trial date and pretrial deadlines, including a deadline for motions.

This request is being made given the volume of discovery in this matter. It should be noted, the discovery exceeds half terabyte in memory. Further, counsel has provided the government with a hard drive to receive the same, but as of the writing of this letter, discovery has not been received. It is anticipated it will be received later this week.

Accordingly, the defendant will be requesting the Court grant a continuance beyond the speedy trial deadline pursuant to 18 U.S.C. § 3161(h)(7)(b)(iv). This is predicated on 1) the volume of discovery; 2) the need to review discovery for potential evidentiary motions, and 3) the need for adequate time to prepare the case for trial or disposition. As such, counsel will request that the Court grant an extension to the speedy trial deadline which is currently March 24, 2020. It is my understanding the Government does not oppose this request.

Therefore, please contact me, along with co-counsel and the government office to schedule this matter as requested herein.

Best regards,

JONES LAW FIRM LLC

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Russell J. A. Jones